

EXHIBIT A


RE: Ch-11 23-13237-pmm Response - Tri-State Paper, I

Joshua Ladov <jladov@ladovlaw.com>

Wed 2/28/2024 4:47 PM

To: Cibik Law, P.C. <mail@cibiklaw.com>

Cc: Tracy Gill, Esq. <admin@ladovlaw.com>; Jill Levy, Esq. <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

 2 attachments (826 KB)

Tri-State - Debtor's Opposition to Motion to File POC out of time 02.28.24.pdf; Tri-State Paper Inc - PG.pdf;

Mr. Assad,

I just left a voicemail for you in response to your attached opposition to Penn Jersey's Motion. I also attach the PG of Justino Petaccio for discussion. Please call me at your earliest convenience.

Thank you.

JOSHUA B. LADOV, ESQUIRE
LADOV LAW FIRM, P.C.
1101 MARKET STREET, SUITE 2820
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Re: Ch-11 23-13237-pmm Response - Tri-State Paper, I

Mike Assad <mike.assad@cibiklaw.com>

Wed 02/28/2024 11:42 PM

To: Joshua Ladov <jladov@ladovlaw.com>

Cc: Tracy Gill, Esq. <admin@ladovlaw.com>; Jill Levy, Esq. <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

Just tell me what you want.

Sent from my iPhone

Mike Assad
Associate Attorney

CibikLaw

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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Joshua Ladov <jladov@ladovlaw.com>

Thu 02/29/2024 12:19 PM

To: Mike Assad <mike.assad@cibiklaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

I want the withdrawal of Debtor's objection to Penn Jersey Paper Co's (PJP) Motion, and Debtor's consent to the PJP Motion to allow the late-file proof of claim in exchange for:

1. PJP's release of Justino Petaccio and his heirs, estate, successors, etc. from his personal guaranty, to become effective upon payment of PJP's proof of claim;
2. PJP's withdrawal of its objection to the Ch. 11 Plan (to be filed before 3/6); and
3. Debtor's release of any and all claims against PJP, its successors and assigns.

I am happy to discuss. Please advise.

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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Mike Assad <mike.assad@cibiklaw.com>

Thu 02/29/2024 12:43 PM

To: Joshua Ladov <jladov@ladovlaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

I have discussed this with the debtor's principal, and he has directed me to reject this offer and continue to oppose your client's motion.

Mike Assad

Associate Attorney



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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Joshua Ladov <jladov@ladovlaw.com>

Thu 02/29/2024 12:55 PM

To: Mike Assad <mike.assad@cibiklaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

Acknowledged. Thank you for your response. Will proceed accordingly.

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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Joshua Ladov <jladov@ladovlaw.com>

Mon 03/11/2024 4:50 PM

To: Mike Assad <mike.assad@cibiklaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

 1 attachments (4 MB)

TRI-STATE - Notice of Claim to Estate FILED 03.11.24.pdf;

Counsel,

Attached please find \$93,964.96 claim filed today against the Estate of Justino Petaccio, Sr., the administrators of which are Richard W. Hoy, Esquire and John A. Petaccio.

Penn Jersey's claim will either be paid out of:

1. The Tri-State Bankruptcy through the Plan in the amount of \$70,000 if we settle along the terms I previously proposed; or
2. The Petaccio Estate in the amount of \$93,964.96; or
3. Potentially (pending disposition of Penn Jersey's Motion and/or Objection) \$70,000 from Tri-State and \$23,964.96 from the Petaccio Estate.

Let me know if you would like to discuss. If not, I'll see you in court on Wednesday.

Thank you.

JOSHUA B. LADOV, ESQUIRE
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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Mike Assad <mike.assad@cibiklaw.com>

Mon 03/11/2024 5:01 PM

To: Joshua Ladov <jladov@ladovlaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

I represent Tri-State Paper, Inc. I do not represent John Petaccio individually, nor do I represent the estate of Justino Petaccio Sr.

Mike Assad

Associate Attorney

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RE: Ch-11 23-13237-pmm Response - Tri-State Paper, Inc - for settlement purposes only

Joshua Ladov <jladov@ladovlaw.com>

Mon 03/11/2024 5:06 PM

To: Mike Assad <mike.assad@cibiklaw.com>

Cc: Ladov Law <admin@ladovlaw.com>; Jill Levy <jlevy@ladovlaw.com>; Tisha M Salim-Bey <tsalim@pjponline.com>

Understand, but you have an obligation to convey to "debtor's principal" who you note rejected Penn Jersey's previous offer. Have you conveyed?

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Mike Assad <mike.assad@cibiklaw.com>

Mon 03/11/2024 5:49 PM

To: Joshua Ladov <jladov@ladovlaw.com>

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The debtor's principal has expressly instructed me to reject all settlement proposals and press the objection in front of the court. Given that, I have no obligation to convey this offer to the debtor's principal. Nevertheless, I did speak with the debtor's principal within the past hour, and he renewed that instruction even after I informed him of this offer.

Mike Assad

Associate Attorney

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